

### **REMARKS**

The following comments are responsive to the Office Action mailed December 24, 2008 ("Action"). Claims 1-5, 7-10, 12-18, 20-25, 27-31, and 33-41 are currently pending and stand rejected. Reconsideration and allowance of the claims are respectfully requested.

#### **Claim Rejections Under 35 U.S.C. § 103**

Claims 1-4, 9-11, 29, and 34 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Willars et al. (U.S. Patent Publication No. 2003/0013443 A1) in view of Yukie (U.S. Patent Publication No. 2003/0036392 A1). Claims 5 and 31 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the combination of Willars and Yukie, further view of Chambert (U.S. Patent No. 5,499,387). Claims 7, 8, 30, and 33 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the combination of Willars and Yukie, in further view of Kennedy, III, et al. (U.S. Patent No. 5,966,658). Claims 12 and 13 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the combination of Willars and Yukie, in further view of Igarashi et al. (U.S. Patent Publication No. 2001/0053694 A1). Claims 14-17 and 22-26 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the combination of Willars and Yukie, in further view of Funato et al. (U.S. Patent Publication No. 2003/0087646 A1). Claim 18 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over the combination of Willars, Yukie, and Funato, in further view of Chambert. Claims 20 and 21 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the combination of Willars, Yukie, and Funato, in further view Kennedy. Claims 27 and 28 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Willars, Yukie, and Funato, in further view Lgarashi. Applicants respectfully traverse for at least the following reasons.

#### **A. Comments on Claim 1**

Applicants request reconsideration of the remarks submitted in the Response submitted September 12, 2008.

Further, Applicants disagree with the comments provided on pages 15-16 of the Action, and, in particular, the comments describing paragraph 0079 of Willars. On page 16 with reference to paragraph 0079 of Willars, the Action alleges that "a handover algorithm can be for

different user equipment which (sic) belong to different PLMN's (Public Land Mobile Networks) which infers that there (sic) can be more than one network in which the teaching of Willars are applicable with." Applicants respectfully disagree as Willars does not support any such inference.

Willars does not teach or suggest a handover between different networks; rather, Willars only discloses one network. Paragraph 0079 of Willars discloses that "the handover algorithm can be different for user equipment units which belong to different PLMNs." In no way does this suggest a handover between different networks. Merely because handover algorithms are different for user equipment units belonging to different PLMNs does not somehow suggest Willars discloses a handover between different networks. Thus, Willars only discloses one network, but does not teach or suggest handovers between different networks.

Moreover, the Action continues to improperly allege that Willars discloses (1) a Serving Network that allegedly reads on the claimed first network and (2) a Drift Network that allegedly reads on the claimed second network. *See* Action at p. 2. Contrary to this assertion, Willars makes no mention of a Serving Network or a Drift Network, but rather discusses a Drift *Controller* and a Serving *Controller*. Willars teaches a single radio access network 14 having one or more radio network controllers (SRNC & DRNC). *See* Willars at ¶ 48; *see also* FIG. 1A. The multiple network controllers may help control radio resources and radio connectivity (*id.* at ¶ 6). Willars makes no mention of a Serving Network or a Drift Network, but rather merely discusses "a radio access network comprising a serving radio network control node and a drift radio network control node." *Id.* at Abstract. As such, Willars only uses a *single* network, but does not suggest or imply the existence of other networks, as asserted by the Action.

Accordingly, Willars does not teach or suggest "receiving from a first access router in a first network by a second access router in a second network that serves a different service area a request for authorization inquiry including an identifier that identifies a mobile terminal that is a candidate for a handoff operation" or "causing a database to be queried via a server to determine whether the second access router is authorized to accept a handoff operation for the mobile terminal." Willars does not even mention the word, "server," let alone a method that comprises "causing a database to be queried via a server ..." as claimed in claim 1.

As noted in the Response filed September 18, 2008, the other cited art, such as Yukie, do not remedy the deficiencies in Willars. Thus, even if the proposed combination of Willars and Yukie was proper, the proposed combination does not result in the invention of claim 1. Accordingly, Applicants respectfully request that the rejection of claim 1 under 35 U.S.C. § 103(a) be withdrawn.

B. Comments on Claims 2-5, 7-10, 12-18, 20-25, 27-31, and 33-41

The claims depending from base claim 1 are patentable over a proposed combination of Willars and Yukie for at least same reasons that claim 1 is patentable and for the additional features recited therein. The other cited references do not remedy the deficiencies in a proposed combination of Willars and Yukie.

Independent claims 14 and 29 have similar features as claim 1 and are allowable for at least the same reasons in addition to the features recited therein. The claims depending from base claim 14 or 29 are patentable over a proposed combination of cited references for at least same reasons that claim 1 is patentable and for the additional features recited therein.

**CONCLUSION**

Applicant respectfully submits that the pending claims are in condition for allowance. Favorable reconsideration of this application is respectfully requested. The Examiner is invited to contact the undersigned should it be deemed necessary to facilitate prosecution of the application.

Respectfully submitted,  
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